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Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

COMMENTS ON DRAFT REGULATORY GUIDE DG-1117

Dear Sirs:

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut appreciate the opportunity to comment on the draft regulatory guide, DG-1117, "Control of Combustible Gas Concentrations in Containment," as requested in the Federal Register, volume 67, number 159, page 53628 on August 16, 2002. Our comments are as follows:

1. The following statement appears in Item 3 of the fourth paragraph of Section B, Discussion:

"For all applicants for and holders of a construction permit or operating license under 10 CFR Part 50, and all applicants for a design approval, design certification, or combined license under 10 CFR Part 52 that are issued after the effective date of the rule, the following requirement applies. All containments must have an inerted atmosphere or limit hydrogen concentrations in containment during and following an accident that releases an equivalent amount of hydrogen as would be generated from a 100% fuel-clad coolant reaction, uniformly distributed, to less than 10% and must maintain containment structural integrity."

Discussion: The language applied in this item may be interpreted to apply to current holders of an operating license. The item discussed above appears in Part 50.44(c)(2) of the proposed rule and is intended to apply as a requirement for future applicants and licensees. The current language does not make this point clear.

Recommendation: Reword the first sentence of the paragraph similar to the following, which is nearly identical to the wording in 10 CFR Part 50.44(c) of the proposed rule:

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E-RIDS = ADM-03
Add = D.C. Collision (DFC)
T. Clark (LTC)

"The following requirement applies to all construction permits or operating licenses under 10 CFR Part 50, and to all design approvals, design certifications, or combined licenses under 10 CFR Part 52, any of which are issued after the effective date of the rule."

2. The first paragraph of Section 5, Containment Structural Integrity, discusses the requirement that containment structural integrity be demonstrated by use of an analytical technique that is acceptable by the NRC staff. The paragraph goes on to state:

"The analysis must address an accident that releases hydrogen generated from 100 percent fuel clad-coolant reaction accompanied by hydrogen burning."

Discussion: This statement appears to be more consistent with the requirements for future applicants and licensees in Parts 50.44(c)(3) and 50.44(c)(5). This criterion is not addressed for current licensees in Part 50.44(b)(5)(v).

The statement concerning the hydrogen generated from 100 percent fuel clad-coolant appears to apply to all licensees. According to the proposed rule, this item would apply only to future applicants and licensees.

Recommendation: Reword the sentence similar to:

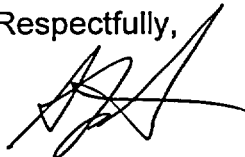
"For future applicants and licensees as defined in Part 50.44(c), the analysis must address an accident that releases hydrogen generated from 100 percent fuel clad-coolant reaction accompanied by hydrogen burning."

If you have any questions regarding our comments, please contact:

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Mr. Don Olson don_olson@dom.com or (804) 273-2830

Respectfully,



S. P. Sarver, Director
Nuclear Licensing & Operations Support